

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Implementation of the) CC Docket No. 96-128
Pay Telephone Reclassification)
and Compensation Act of 1996)

REPLY COMMENTS OF THE
UNITED STATES TELEPHONE ASSOCIATION

The United States Telephone Association ("USTA") hereby files these reply comments in response to the Commission's *Public Notice*.¹ USTA is the principal trade association for the local exchange carrier industry ("LECs").

The Commission's *Public Notice* was issued in response to USTA's Petition for Waiver ("Petition"), a waiver petition filed by TDS, and a letter requesting similar relief filed by the LEC ANI Coalition² regarding its payphone Orders.³ USTA agrees with APCC that the Commission should immediately answer the following questions: (I) what coding digit system is ultimately

¹ *Public Notice* DA 97-2214 released October 20, 1997.

² USTA's Petition for Waiver (September 30, 1997); TDS petition for Waiver (October 1, 1997); Letter from Michael Kellogg to John Muleta, Deputy Chief Common Carrier Bureau (September 30, 1997) (LEC ANI Coalition consists of Ameritech, Bell Atlantic, BellSouth, GTE, Pacific Bell, SBC, Nevada Bell, SNET and US WEST).

³ *Implementation of the Pay Telephone Reclassification and Compensation Provisions of the Telecommunications Act of 1996*, CC Docket No. 96-128, *Report & Order*, 11 FCC Rcd 20541 (1996) ("*Payphone Order*"); *Order on Reconsideration*, 11 FCC Rcd 21233 (1996) ("*Order on Reconsideration*").

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required; (2) what is the timetable for complete implementation of this system; (3) how should the required coding digit service be tariffed; and (4) what kind of compensation plan should be in effect during the waiver period.⁴ As USTA, the LEC ANI Coalition, and TDS have explained, the absence of answers to these and other questions supports Commission grant of a waiver. USTA urges the Commission to grant its Petition because special circumstances warrant the relief requested and the public interest will benefit from a waiver adopted consistent with arguments raised in USTA's Petition and this filing.

**USTA'S WAIVER PETITION
IS SUPPORTED BY THE RECORD
AND SHOULD BE GRANTED**

WorldCom and other parties argue that USTA's Petition, and others under consideration by the Commission, fail to meet the standard required for a waiver.⁵ The purported basis of WorldCom's argument is that the requested relief is overly broad, can only be addressed in a rulemaking, and the relief requested will not solve the problem of implementing specific coding digits that provide for per-call tracking.⁶ WorldCom's argument simply ignores the standard for

⁴ APCC Comments at ii-iii, 13.

⁵ WorldCom Comments at 6-12; AT&T Comments at 1-3 (October 30); Frontier Comments at 2-7; MCI Comments at 5-10; CompTel at 4; Sprint Comments at 2. Unfortunately, these parties fail to recognize the difficulty of implementing per-call tracking. Also, as explained by the LEC ANI Coalition, interexchange carriers have been inconsistent in comments regarding their ability to use existing LEC technology to deploy per-call tracking, waffling over the time and cost of implementing per-call tracking and compensation arrangements. *See* LEC ANI Coalition Comments at 3-4.

⁶ *Id.* at 7-8

granting a waiver and the facts presented in support of the waiver requests.

As USTA explained in its Petition,⁷ "Waiver of the Commission's rules is appropriate only if special circumstances warrant a deviation from the general rule and such deviation serves the public interest."⁸ In addition, the Commission has previously granted waivers in this proceeding.⁹

The Commission's own *Waiver Order* acknowledges the difficulty of implementing per-call tracking. As the Commission stated:

This waiver of the requirements applicable to LECs and PSPs will provide LECs, IXC's and PSPs with additional time that the record indicates is necessary to implement the procedures needed to transmit payphone-specific coding digits, without further delaying the payment of per-call compensation required by Section 276 of the Act.¹⁰

The Commission's *Waiver Order* also serves the public interest. The Commission acknowledged:

The efforts to date indicate that the industry is working collaboratively in good faith toward the goal of enabling all payphones to transmit coding digits.

⁷ USTA Petition for Waiver at 4.

⁸ *In the Matter of Implementation of the Pay Telephone Reclassification Order and Compensation Provisions of the Telecommunications Act of 1996*, CC Docket No. 96-128, Order at 12, ¶23 (released April 4, 1997), citing *Northwest Cellular Telephone Company v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990) and *WAIT Radio v. FCC*, 418 F.2d 1153, 1159 (D.C. Cir. 1969); See also *In the Matter of Implementation of the Pay Telephone Reclassification Order and Compensation Provisions of the Telecommunications Act of 1996*, CC Docket No. 96-128, Order at 11-12, ¶23 (released April 15, 1997).

⁹ See, e.g., *In the Matter of Implementation of the Pay Telephone Reclassification Order and Compensation Provisions of the Telecommunications Act of 1996*, CC Docket No. 96-128, Order (released April 15, 1997)(Commission grants waiver for LECs filing intrastate tariffs); Order (released April 4)(Commission grants waiver for LECs filing interstate tariffs).

¹⁰ *Waiver Order* at 4, ¶9, CC Docket No. 96-128 (October 7, 1997).

Waiver of this rule will serve the public interest because it will allow us to move forward in implementing the statutory requirement that PSPs receive fair compensation for calls placed from their payphones. Refusal to waive this requirement would lead to the inequitable result that many payphone providers -- particularly independent providers who do not control the network modifications necessary to permit payphone-specific coding digits to be transmitted -- would be denied any compensation while implementation issues are being resolved by the industry.¹¹

Comments from the LEC industry indicate that their efforts to provide specific coding digits through the implementation of Flex ANI will comply with the Commission's March 9, 1998 deadline.¹² Where carriers have chosen to implement Flex ANI, it is clear that a further waiver is necessary and would serve the public interest. Bell Atlantic and SBC explain that limitations in their network switches ability to pass Flex ANI coding digits will require further network modifications which cannot be completed by March 9.¹³

Carriers who deploy OLNS/LIDB¹⁴ should be permitted to continue to make use of this service in meeting the requirement to provide per-call tracking of payphone calls. The need for flexibility and optionality in the Commission's regulations is further supported by the nationwide deployment of OLNS/LIDB. In its Comments, Illuminet states that it provides OLNS/LIDB services to over 900 independent LECs nationwide.¹⁵ APCC, the industry trade association for independent PSPs, supports the use of OLNS/LIDB concluding:

¹¹ *Id.* at 4, ¶¶10-11.

¹² Ameritech Comments at 2.

¹³ Bell Atlantic Comments at 1; SBC Comments at 2-6.

¹⁴ *See* SNET Comments at 1-5; TDS Comments at 1-6.

¹⁵ Illuminet's Comments at 2.

AT&T alleges that it cannot track payphone calls and pay per-call compensation in the absence of payphone-specific ANI transmitted on every call AT&T's support for this claim is not convincing. There does not appear to be any compelling reason why AT&T or other carriers could not, if necessary, track and pay per-call compensation by using OLNS ... or even LEC-ANI list screening. AT&T claims OLNS or variations of OLNS can be used only to track access code calls -- and cannot be used to track subscriber 800 calls -- because only access code calls are routed to a Class 5 switch that can launch a data base query. Yet, during 1996, AT&T, MCI and Sprint were tracking and paying per-call compensation to payphone providers in Illinois, for intrastate access code *and* subscriber 800 calls, pursuant to an order of the Illinois Commerce Commission Furthermore, MCI and Sprint have both indicated that they can track subscriber 800 payphone calls well enough to bill 800 service subscribers a payphone compensation surcharge of 35 cents per call.¹⁶

As USTA stated in its Petition, the Commission has recognized that tracking capabilities vary from carrier to carrier and for that reason the Commission concluded that it would not mandate a particular technological standard for per-call tracking.¹⁷ The record in this proceeding establishes that OLNS/LIDB is a technology that meets the tracking requirements and should be accepted as such by the FCC.

LECS WITH NON-EQUAL ACCESS SWITCHES SHOULD BE EXEMPT FROM PROVIDING SPECIFIC PAYPHONE DIGITS

There is no disagreement that LECs with non-equal access switches should be granted a waiver from providing specific coding digits.¹⁸ This waiver should also apply to switches which

¹⁶ APCC Comments at 21-22.

¹⁷ USTA Petition at 7-8, citing the Commission's *Payphone Report and Order* at 50, ¶96; *Payphone Reconsideration Order* at 46, ¶¶93, 99.

¹⁸ See, e.g., AT&T Comments at 7 (October 7, 1997); MCI Comments at 3; NECA Comments at 2-3; Sprint Comments at 3.

employ Bell I signaling. In addition, the Commission should retain the bulk compensation arrangement currently in place under the Commission's *Waiver Order* or permit per-call compensation through the use of LEC ANI lists.

COST RECOVERY SHOULD BE IMPLEMENTED PRIOR TO THE COMMISSION MANDATING FLEX ANI

A number of commentators have stated that the Commission should require LECs to provide specific coding digits through Flex ANI.¹⁹ The Commission must authorize full cost recovery prior to mandating implementation of Flex ANI to ensure that LECs are not burdened with the expense of implementing a Commission mandate with no means to pay for it. By establishing a cost recovery mechanism prior to mandating Flex ANI, LECs will avoid the financial burdens which currently exist in deploying local number portability where no cost recovery mechanism has been established by the Commission.

In CC Docket No. 91-35, the Commission permitted LECs the option of tariffing OLNS/LIDB or Flex ANI for providing fraud protection. Either Flex ANI or OLNS/LIDB can be used to meet the requirements under the Act that PSPs are fairly compensated for payphone traffic. Carriers such as SNET, TDS, and US WEST, however, relied on the Commission's Order in CC Docket No. 91-35 in implementing OLNS/LIDB, a service which has not found a market and is not likely should the Commission mandate Flex ANI for per-call tracking.²⁰ LECs

¹⁹ See, e.g., AT&T Comments at 1-4 (October 30, 1997); MCI Comments at 4-5; Sprint's Comments at 3.

²⁰ LECs which have deploy OLNS/LIDB, pursuant to the Commission's Order in CC Docket No. 91-35, remain under the obligation to provide this tariffed service. The

who have deployed OLNS/LIDB should not now be required to deploy both this service and Flex ANI without compensation.

LECs should not face the *Hobson's Choice* of deploying OLNS/LIDB pursuant to CC Docket No. 91-35, while later being told by the Commission that the technology deployed is obsolete. LECs converting to Flex ANI must be permitted sufficient time to coordinate with vendors and IXC's to ensure that the most efficient and effective deployment of Flex ANI occurs. In the interim, payphone compensation would be paid on a bulk rate basis as currently required in the Commission's *Waiver Order*,²¹ or per-call compensation through the use of LEC ANI lists should be permitted.

**LECS SHOULD BE COMPENSATED
FOR USE OF TARIFFED SERVICES USED
IN FRAUD DETECTION**

LECs are required to tariff services designed to detect fraudulent use of telecommunications services under the Commission's Order in CC Docket 91-35. Therefore, under any Commission mandate in which Flex ANI or any other service is required to be used for per-call tracking, the Commission should require IXC's to pay compensation to LECs on a per call basis for payphone calls which are blocked. Clearly, a blocked call may result from the IXC using Flex ANI or OLNS/LIDB for fraud detection. Thus, IXC's should compensate LECs

Commission stated in its *Waiver Order* that "[t]his waiver does not change the obligations of LECs pursuant to our requirements in ... CC Docket No. 91-35, 11 FCC Rcd 17, 021 (1996)." *Waiver Order* at 4 note 20.

²¹ *Implementation of the Pay Telephone Reclassification and Compensation Provisions of the Telecommunications Act of 1996*, CC Docket No. 96-128, Order, DA 97-2162 (Com. Car. Bur., Oct. 7, 1997) ("*Waiver Order*").

pursuant to the Commission's Order in CC Docket No. 91-35 for blocked calls. The IXC's should be required to implement a system to ensure proper accounting of all blocked calls, provide a list to LECs on a monthly basis, and pay appropriate compensation based upon the tariffed rates for use of Flex ANI or OLNS/LIDB.

**USTA AGREES WITH THE COMMENTS
OF THE LEC COALITION REGARDING AT&T'S
ALTERNATIVE REQUEST FOR RELIEF**

AT&T proposes that it be granted a waiver to calculate its payments on a per-phone basis when payphones are unable to provide specific coding digits.²² As the LEC ANI Coalition correctly describes, AT&T has refused to pay compensation currently owed to PSPs, particularly to LEC affiliated PSPs.²³ USTA agrees with the comments of the LEC ANI Coalition that any waiver granted should (1) be permitted only after interim compensation has been paid,²⁴ and (2) apply only to IXCs that demonstrate that they cannot track compensable calls using LEC ANI lists.

USTA also supports the LEC ANI Coalition opposition to AT&T's request for a schedule of when specific coding digits will be available from LEC equal access end offices.²⁵ This reporting requirement is unnecessary. As the LEC ANI Coalition explained:

[I]t would be infeasible and inefficient for the LECs to provide a schedule stating

²² AT&T *Ex parte* at 3 (October 14, 1997).

²³ LEC ANI Coalition Comments at 4.

²⁴ *See also* APCC Comments at 21.

²⁵ AT&T *Ex parte* at 3 (October 14).

when they will provide Flex ANI from individual end offices. The deployment of the switch software and the necessary switch translations work will severely tax the LECs' already overburden resources. Moreover, the LECs must work closely with (and receive specific orders from) IXC's in converting specific offices; LEC scheduling in a vacuum is useless without demand estimates from, and testing with, IXC's. As a consequence, the LECs should be given the freedom to deploy the necessary technology in the most efficient manner possible.²⁶

THE RECENT COURT OF APPEALS DECISION DOES NOT IMPACT THIS PROCEEDING

On October 31, 1997, the United States Court of Appeals released a decision in *C.F. Communications v. FCC*²⁷ which some may believe impacts this proceeding. In its ruling, the Court concluded that the FCC could not treat payphones owned by PSPs differently from those owned by LECs in determining whether to assess an end user common line charge.

Independent PSP phones are predominately smart phones, while LEC owned payphones are predominately dumb phones. The use of OLNS/LIDB would not adversely affect PSP payphones. PSPs with smart phones would still receive per-call compensation by the carriers. In short, independent PSPs are not disadvantaged *vis-a-vis* LEC owned payphones whether the coding digits are provided to the IXC's through Flex ANI or OLNS/LIDB.

CONCLUSION

The record in this proceeding overwhelmingly supports the grant of USTA's Petition. Deployment of either Flex ANI or OLNS will provide for per-call compensation. LECs,

²⁶ LEC ANI Coalition Comments at 9.

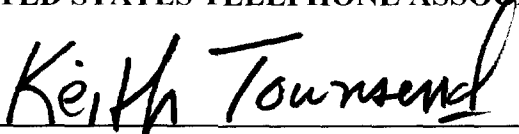
²⁷ *Slip Opinion*, Case No. 95-1563.

particularly small, rural and mid-size LECs, would bear unnecessary administrative, technological and financial burdens if they are not permitted to use existing facilities to provide per-call tracking. Should the Commission mandate a particular technical and service standard, such as Flex ANI, LECs should not be forced to implement the mandate until after appropriate cost recovery has been ordered to ensure that the financial burden is competitively neutral to LECs. In addition, the Commission should grant a waiver to LECs serving payphones with non-equal access switches and switches that currently employ Bell I signaling. Compensation would be paid pursuant to the Commission's *Waiver Order* or by per-call compensation through the use of LEC ANI lists. Granting AT&T's waiver request to pay compensation on a per-phone basis must be conditioned on AT&T, and any other IXC, paying interim compensation currently owed. AT&T's request that LECs provide lists stating when Flex ANI will be deployed should be denied.

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November 6, 1997

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